IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

| In re: Application Pursuant to |) | |
|--------------------------------|---|---------------------------|
| 28 U.S.C. 1782 of |) | |
| |) | |
| FARHAD AZIMA |) | Case No.: 22-20707-cv-JEM |
| |) | |
| Petitioner, |) | |
| v. |) | |
| |) | |
| INSIGHT ANALYSIS AND RESEARCH, |) | |
| LLC, and SDC-GADOT LLC, |) | |
| |) | |
| Respondents, |) | |
| |) | |
| |) | |

RESPONDENTS' RESPONSE TO DE # 79 AND JOINDER IN MOTION:

Respondents, INSIGHT ANALYSIS AND RESEARCH, LLC and SDC-GADOT, LLC, by and through the undersigned attorneys, hereby file this, their Response to Petitioner's Motion to Appear Virtually for February 13, 2024 hearing, and Respondents' joinder in request for authorization to appear virtually, as follows:

- 1. On February 6, 2024 this Court entered a Paperless Order scheduling a hearing on Petitioner's Motion filed at DE # 73. The hearing was scheduled for February 13, 2024 at 10:30 am in person.
- 2. Counsel for the Respondents (Elan Baret, Esq.) is travelling abroad, and Christopher S. Salivar, Esq. also possesses a conflict, and as such the Respondents have communicated with counsel for the Petitioner and have no objection (if the Court allows) to having the hearing conducted remotely via Zoom or other method authorized by the Court.
- 3. Respondents further join in the request for a virtual hearing to allow all counsel for Respondents to appear before the Court.
- 4. Respondents have conferred with counsel for the Petitioner and there is no objection from any party to the relief requested.

WHEREFORE Respondents, SDC-GADOT, LLC and INSIGHT ANALYSIS AND RESEARCH, LLC, respectfully request that the Court GRANT DE # 79 and this DE # 80, that the Court allow counsel for the parties to all appear remotely for the hearing set for February 13, 2024 at 10:30 a.m. EST, and that the Court Grant the Respondents such other and further relief as this Court may deem just and proper.

CERTIFICATE OF COMPLIANCE WITH FONT AND PAGE REQUIREMENTS:

The undersigned hereby certifies that this Motion complies with the requirements of Local Rules 5.1 and 7 pertaining to font size and length of this Motion.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 12th day of February, 2024, that a true and correct copy of the foregoing has been filed through the Court's CM/ECF-filing portal and that a true copy has been served through the portal upon all counsel of record in this action.

Respectfully submitted,

By: /s/ Elan I. Baret, Esq. Elan I. Baret, Esquire Florida Bar No.: 20676

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By: <u>/s/ Christopher S. Salivar, Esq.</u> Christopher S. Salivar, Esquire Florida Bar No.: 57031